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9 Attorney for Defendant
10 HOOTAN MELAMED

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOOTAN MELAMED (1),
JEAN FRANCOIS PICARD (2),
JOHN PANGELINAN (3),
PHONG HUNG TRAN (4),
JONATHAN PENA (5),

Defendants.

CASE NO. 16CR1409H

**UNOPPOSED MOTION
AUTHORIZING TRAVEL AND
MODIFYING BOND FOR
DEFENDANT HOOTAN
MELAMED DURING PRETRIAL
RELEASE**

**[[PROPOSED] ORDER LODGED
CONCURRENTLY HEREWITH]**

Defendant Hootan Melamed, by and through his counsel of record, Steven M. Goldsobel, hereby brings this Unopposed Motion Authorizing Travel and Modifying Bond for Defendant Hooton Melamed During Pretrial Release.

1. On June 16, 2016, Melamed was indicted in *United States v. Melamed, et al.*, Case No. 16CR1409H, and, currently, he is on pretrial release. His conditions of bond authorize him to travel throughout the State of California and, upon prior approval from Pretrial Services, to Las Vegas, Nevada.

2. Melamed wishes to travel to Salt Lake City, Utah for a vacation with his significant other from December 20, 2016 to December 23, 2016.

3. Melamed further requests that his bond be modified to allow for travel

1 to and from Las Vegas, Nevada without prior approval of Pretrial Services.
2 Malamed makes this request because his significant other resides in Las Vegas,
3 Nevada.

4 4. Pretrial Services does not oppose either request or the bond
5 modification.

6 5. On December 15, 2016, undersigned counsel for Melamed provided a
7 copy of this stipulation and proposed order to Assistant United States Attorney
8 Valerie H. Chu, who does not oppose entry of the requested order.

9 6. Accordingly, Melamed respectfully requests that the Court enter an
10 order:

11 a. authorizing Melamed to travel to Salt Lake City, Utah from
12 December 20, 2016 through December 23, 2016; and

13 b. modifying the conditions of Melamed's bond to allow his travel
14 throughout the State of California and to and from Las Vegas, Nevada
15 without prior approval from Pretrial Services.

16 IT IS SO STIPULATED.

17 Dated: December 16, 2016 LAW OFFICES OF STEVEN GOLDSOBEL
18 A PROFESSIONAL CORPORATION

19 By: /s/ Steven M. Goldsobel
20 STEVEN M. GOLDSOBEL
21 Attorney for Defendant Hootan Melamed

22 Dated: December 16, 2016 LAURA E. DUFFY
23 UNITED STATES ATTORNEY

24 By: /s/ Valerie H. Chu
25 Valerie H. Chu
26 Assistant United States Attorney
27 Attorney for Plaintiff
28 United States of America

NOTICES OF ACKNOWLEDGMENT

I, Hootan Melamed, hereby acknowledge my request to travel to Salt Lake City, Utah on December 20, 2016 and return to Los Angeles, California on December 23, 2016 and request to modify my conditions of bond to allow for travel to and from Las Vegas, Nevada.

Dated: 12/16/16

Signed: 

Defendant Hootan Melamed

I, Houshang Melamed, hereby acknowledge and consent to Hootan Melamed's request to travel to Salt Lake City, Utah on December 20, 2016 and return to Los Angeles, California on December 23, 2016. I further acknowledge and consent to Hootan Melamed's request to modify the bond to allow for travel to and from Las Vegas, Nevada.

Dated: _____

Signed: _____

Surety Houshang Melamed

SIGNATURE CERTIFICATION

I hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 16, 2016

/s/ Steven M. Goldsobel

Steven M. Goldsobel

NOTICES OF ACKNOWLEDGMENT

I, Hootan Melamed, hereby acknowledge my request to travel to Salt Lake City, Utah on December 20, 2016 and return to Los Angeles, California on December 23, 2016 and request to modify my conditions of bond to allow for travel to and from Las Vegas, Nevada.

Dated: _____

Signed: _____
Defendant Hootan Melamed

I, Houshang Melamed, hereby acknowledge and consent to Hootan Melamed's request to travel to Salt Lake City, Utah on December 20, 2016 and return to Los Angeles, California on December 23, 2016. I further acknowledge and consent to Hootan Melamed's request to modify the bond to allow for travel to and from Las Vegas, Nevada.

Dated: 12/16/16

Signed: _____
Surety Houshang Melamed

SIGNATURE CERTIFICATION

I hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 16, 2016

/s/ Steven M. Goldsobel
Steven M. Goldsobel